

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

ZUCA PROPERTIES LLC.,

Debtor.¹

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Chapter 11

Case No. 21-11082

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that, pursuant to § 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Mayer Brown LLP hereby appears as counsel to The Woofy Trust, a party in interest in the above-captioned chapter 11 case. Pursuant to Rules 2002, 3017(a), 9007 and 9010 of the Bankruptcy Rules and § 1109(b) of the Bankruptcy Code, the undersigned respectfully requests that all notices and papers filed or entered in this case be given to and served upon the following persons:

Joaquin M. C de Baca
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PLEASE TAKE FURTHER NOTICE that pursuant to § 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, orders and notices of any applications,

¹ The last four digits of the Debtor’s federal tax identification number are 5359. The Debtor’s address is c/o Togut, Segal & Segal LLP, One Penn Plaza, Suite 3335, New York, New York, 10119.

motions, petitions, pleadings, complaints, demands, disclosure statements, or plans of reorganization transmitted or conveyed by mail, electronic mail, hand delivery, telephone, telecopier, or otherwise, which affect the above-captioned Debtor, property of the Debtor or The Woofy Trust.

PLEASE TAKE FURTHER NOTICE that The Woofy Trust does not intend that this Notice of Appearance and Request for Notices and Papers or any later appearance, pleading, proof of claim, claim, or suit be deemed or construed to be a waiver of (1) the right to have final orders entered only after *de novo* review by a District Judge, (2) the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this notice, or (5) to any other rights, claims, actions, defenses, setoffs, or recoupments to which it is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments The Woofy Trust expressly reserves.

Dated: June 8, 2021
New York, New York

Respectfully submitted,

By: /s/ Joaquin M. C de Baca
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